

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

ROGER FRANKLIN TURNER,

Plaintiff,

vs.

DUANE M. WALDERA, ET AL.

Defendants.

**DEFENDANT DUANE M.
WALDERA'S EXPERT WITNESS
DISCLOSURE**

Case No. 3:16-cv-384-wmc

Defendant Duane M. Waldera, by his attorneys, Hale, Skemp, Hanson, Skemp, and Sleik, by Garrett T. Pankratz, pursuant to the Court's Preliminary Pretrial Conference Order and Federal Rule of Civil Procedure 26(a)(2) discloses that the following individuals may be called as expert witnesses in the trial of this action:

1. Any physician, healthcare provider, or nurse with whom the plaintiff has treated or consulted for his fall and morphine withdrawal during his incarceration at the Jackson County Jail. Each physician, healthcare provider, or nurse is expected to testify as to the treatment of Mr. Waldera and the appropriateness thereof. Defendant Waldera is unable to disclose the names of such physicians, healthcare providers, or nurses due to Mr. Turner not providing medical authorizations allowing disclosure of protected health information and healthcare records pursuant to 45 C.F.R. §§ 164.502 and Wis. Stat. § 146.82. Defendant Waldera has filed a Motion to Compel Discovery and for Disclosure of Medical Records to allow use and disclosure of protected health information during the course of litigation.
2. Duane M. Waldera, Jackson County Sheriff. Sheriff Waldera will testify as to policies and/or procedures relating to prescription drug administration at the Jackson County Jail, policies and procedures relating to incarcerated individuals being

brought before a judge for a bail/bond hearing, and probable cause for Mr. Turner's arrest.

3. Scott R. Bowe, Captain/Jail Administrator of the Jackson County Sheriff's Office. Captain Bowe will testify as to policies and/or procedures relating to prescription drug administration at the Jackson County Jail, policies and procedures relating to incarcerated individuals being brought before a judge for a bail/bond hearing, and probable cause for Mr. Turner's arrest.
4. Any expert witness disclosed by any other party.

Dated this 30th day of June, 2017.

HALE, SKEMP, HANSON, SKEMP & SLEIK
Attorneys for Defendant Duane M. Waldera

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 30, 2017, a copy of the Defendant Duane M. Waldera's Expert Witness Disclosure was served by First Class Mail addressed to Roger Franklin Turner, W11851 Thomas Road, Black River Falls, WI 54615 and email at jaraka@centurytel.net.

Dated this 30th day of June, 2017.

HALE, SKEMP, HANSON, SKEMP & SLEIK
Attorneys for Defendant Duane M. Waldera

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